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October 31, 2002

Ms. Bonita Lavelle, Remedial Project Manager
EPA Region 8 (8EPR-SR)
U.S. Environmental Protection Agency
999 18th Street, Suite 300
Denver, CO 80202-2466

2002 NOV - 5 AM 11:36
EPA REGION 8
SUPERFUND BRANCH

Re: Supplemental Information Pursuant to §104 of CERCLA and Request for Exclusion of Globeville Landing Park, Vasquez Boulevard/I-70 (VBI70) Superfund Site – Denver, CO

Dear Bonnie:

The following information is intended to supplement the City and County of Denver's (Denver) January 26, 2000 response to the First Request for Information for the above referenced site and request a determination from EPA that the portions of Globeville Landing Park (Park) located within Operable Unit 2 (OU2) do not warrant inclusion in the VBI70 Superfund site boundary.

Soil samples were collected at the Park in July 2002 as a part of an evaluation of potential risks from smelter contaminants to park workers during the performance of routine landscaping tasks. Shallow subsurface soil samples were collected from 32 locations in Globeville Landing Park in July 2002, as shown in the attached figure. The samples were collected from three depth intervals: 0 to 2 ft below ground surface (bgs) and 2-3 ft bgs at 32 locations, and 4-6 ft bgs at three locations. The samples were analyzed for Arsenic and Lead using EPA Method 6020, and the results are provided in the data package attached to this letter.

Arsenic concentrations range from 2.13 to 11.40 ppm, and appear to be randomly distributed (there are no trends evident in the data that could be based on sample location or depth). The sample locations and results are shown in the figure included in the attachment to this letter. The mean concentration of As detected in the three depth intervals sampled were 5.08 ppm (0-2 ft bgs), 5.91 ppm (2-3 ft bgs) and 7.38 ppm (4-6 ft bgs). These concentrations are within the range of concentrations (1.3-16 ppm) considered to be background for Colorado soils², but exceed the Colorado Soil Remediation Objective¹ of 0.82 ppm As (based on 10⁻⁶ carcinogenic risk) for industrial land use.

Lead concentrations ranged from 16.70 to 570 ppm, and again appear to be randomly distributed. The highest concentration of lead detected (570 ppm at 2-3 ft bgs) is well below the Colorado Soil Remediation Objective of 1460 ppm for industrial land use. In the shallow soil interval, (0 to 2 ft bgs) all of the lead concentrations are below 400 ppm, (they range from 21.8 to 346 ppm) which is the Colorado Soil Remediation Objective for residential land use. It is important to note that only 2 of the 67 samples collected (i.e. less than 3%) had lead concentrations that were above 400 ppm.

The results show that the levels of arsenic and lead in Park soils are not of concern and that soil clean up action under Superfund is not required at the Park. We request that EPA determine that the Park is not part of the VBI70 Superfund Site.

Do not hesitate to contact me at 720-865-5426 if you should have any questions.

Sincerely,



Cindy Bosco, CHMM
Environmental Scientist

Encl: Globeville Landing Park Soil Sampling Plan & Results

cc: Diana Shannon, Dennis Bollmann, Shaun Sullivan
Gene Hook, Leslie Roper (w/ encl.)
Barbara O'Grady, CDPHE (w/ encl.)
Bob Litle, Asarco (w/ encl.)

1. Proposed Soil Remediation Objectives Policy Document, Colorado Department of Public Health and the Environment, Hazardous Materials and Waste Management Division, December 1997.

2. Dragun, James and Andrew Chiasson. Elements in North American Soils. Hazardous Materials Control Institute. Greenbelt, MD, 1991.